

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

**EXHIBIT 23**

ANGELA RUSSELL, AS ADMINISTRATRIX  
OF THE ESTATE OF JEREMY T. RUSSELL  
AND ON BEHALF OF THE WRONGFUL DEATH  
BENEFICIARIES OF JEREMY T. RUSSELL PLAINTIFF

VS. CASE NO. 3:22-cv-294-HTW-LGI

MANAGEMENT & TRAINING CORPORATION;  
MICHAEL MCCLINTON; ASHLEY RAY;  
MARCUS ROBINSON; ROXIE WALLACE;  
JACOB VIGLIANTE; JOHN AND JANE DOE  
CORRECTIONAL OFFICERS;  
VITALCORE HEALTH STRATEGIES, LLC;  
EVELYN DUNN; STACEY KITCHENS;  
WILLIAM BRAZIER; and  
JOHN AND JANE DOE MEDICAL PROVIDERS DEFENDANTS

DEPOSITION OF PATRICK ARNOLD, M.D.

taken on Thursday, June 8, 2023,  
commencing at approximately 1:50 P.M.  
at East Mississippi Correctional Facility  
10641 Highway 80 West  
Meridian, Mississippi

REPORTED BY: CYNTHIA HARRIS, RPR, CCR #1828  
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**PATRICK ARNOLD, M.D.**

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1 you taken anything like that in the past 24 hours?

2 A. No.

3 Q. What have you done to prepare for the  
4 deposition today?

5 A. I met with our attorney yesterday.

6 Q. Okay. I don't want to know about  
7 communications between you and your attorney, but did  
8 you review any documents or videos or photographs  
9 during that meeting?

10 A. I reviewed one photo. I reviewed...

11 Q. Go ahead. You were about to list out some  
12 other things.

13 A. I reviewed one photo. I reviewed three pages  
14 of testimony that Major McClinton gave, and that was  
15 it.

16 Q. What photograph?

17 A. It was a photograph that was inside unit 7.

18 Q. It was a photograph of the unit 7, which is  
19 sometimes called camp support; is that right?

20 A. Yes.

21 Q. Was it a screenshot from a video, perhaps, or  
22 do you know?

23 A. It could have been a screenshot from a video.

24 Q. All right. Talk to me about your -- what is  
25 your actual job title at East Mississippi Correctional

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1 Facility?

2 A. I'm the site medical director.

3 Q. And what does that entail?

4 A. I oversee medical care of the inmate  
5 population. I supervise two nurse practitioners - one  
6 -- both of which are part time.

7 Q. Who are the nurse practitioners? I'm sorry; I  
8 cut you off. Say that again.

9 A. Both of those are part time. I think is the  
10 last thing I said.

11 Q. Who are the two nurse practitioners that you  
12 oversee?

13 A. Phillis Hopson and Erica Glover.

14 Q. Do you oversee Nurse Practitioner Evelyn Dunn?

15 A. No, sir.

16 Q. Does she still work at the facility?

17 A. To my knowledge, yes.

18 Q. So do you oversee mental health at the  
19 facility?

20 A. No, sir.

21 Q. And I should say mental health care. So you  
22 don't oversee mental health care. Who is the person  
23 that oversees mental health care at the facility?

24 A. To my understanding, George Anderson.

25 Q. Did you say George Anderson?

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1 A. I think that's his first name.

2 Q. Does he actually physically come to the  
3 facility at any point, to your knowledge?

4 A. Yes.

5 Q. Do you know if he was there on October 7th,  
6 2021, on the date of Jeremy Russell's death?

7 A. I do not know.

8 Q. You did not see him; is that correct?

9 A. I don't recall seeing him.

10 Q. Okay, fair enough. How would you describe  
11 your practice area? I understand that you are the  
12 site medical director, but what would you say your  
13 areas of practice are in medicine?

14 A. My training is in internal medicine.

15 Q. And for the benefit of the record, what is  
16 that?

17 A. That's the treatment of nonsurgical medical  
18 care, typically for adults.

19 Q. Does that include mental health?

20 A. No, sir.

21 Q. Can internists sometimes treat mental health  
22 conditions?

23 A. In the community, they treat depression and  
24 anxiety, but I don't treat depression and anxiety.

25 Q. Okay. That's not something you do?

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1 way that I asked the question produced an answer  
2 that's -- let me just confirm. Are you aware of any  
3 training at East Mississippi on the NCCHC standards?

4 A. No, sir.

5 Q. Have you ever made a decision to pronounce  
6 someone dead?

7 A. No, sir.

8 Q. What type of practitioner would be the one to  
9 be able to make that decision?

10 A. The medical examiner or the coroner.

11 Q. What about an ER physician?

12 A. An ER physician could do it.

13 Q. Have you ever made any decisions about the  
14 cause of death?

15 A. No, sir.

16 Q. Would you be qualified to make a decision  
17 about someone's --

18 MR. BRAGG: Scratch that.

19 BY MR. BRAGG:

20 Q. Would you be qualified to pronounce someone  
21 dead?

22 A. No, sir.

23 Q. Did you know Jeremy Russell before he passed  
24 away?

25 A. I don't recall him.

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1 "And Dr. Arnold said to me, 'Hey, I don't want you  
2 to beat yourself up now'" - we're going on to page 82.

3 "I said, 'Why would you do that, Doc?'

4 "He say, 'In my professional medical opinion, if  
5 you could have been at least two, three minutes  
6 earlier, you possibly could have saved him.'"

7 Do you recall having that conversation with Major  
8 McClinton?

9 A. I do not recall that.

10 Q. Are you here to testify that it didn't happen,  
11 or just that you don't recall it?

12 A. I can't recall it happening.

13 Q. If Major McClinton recalled it happening,  
14 you're not saying that he's wrong?

15 MR. CHASE: Object to form.

16 BY MR. BRAGG:

17 Q. Are you testifying that Major McClinton did  
18 not remember this correctly, or are you just  
19 testifying that you don't recall it?

20 A. My testimony is that I don't recall it.

21 MR. BRAGG: That's all I have for now.

22 MR. CHASE: Did you say that was all?

23 MR. BRAGG: Yes.

24 MR. YOUNG: I don't think I have any questions  
25 right now.